



Department of Energy

Ohio Field Office
Fernald Closure Project
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FEB 14 2005

Mr. James A. Saric, Remedial Project Manager
United States Environmental Protection Agency
Region V-SRF-5J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

DOE-0151-05

Mr. Thomas Schneider, Project Manager
Ohio Environmental Protection Agency
Southwest District Office
401 East Fifth Street
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

CONVERTED ADVANCED WASTEWATER TREATMENT FACILITY – STAGE 2 DESIGN ISSUES – SANITARY SEWAGE HOLDING TANK

Reference: Letter DOE 0104-05, William Taylor to James Saric and Thomas Schneider,
“Transmittal of Revision 0 (Certified for Construction) Design Package for Stage
Two of the Converted Advanced Wastewater Treatment Project.” dated December
28, 2004

As the design effort for Stage 2 of the Converted Advanced Wastewater Treatment Facility (CAWWT) has progressed, one of the remaining issues to be decided relates to the use of a holding tank for the storage of sanitary sewage. This has been the subject of several discussions and was the topic of a meeting between representatives of Fluor Fernald, Inc. (Fluor Fernald) and the Ohio Environmental Protection Agency (OEPA) Division of Surface Water on December 7, 2004.

During the meeting of December 7, 2004 several alternatives were discussed and general concerns relative to the use of holding tanks were shared. Based on Fluor Fernald's recommendation as a result of this meeting, the Department of Energy (DOE) is recommending that a holding tank for the CAWWT facility be installed as proposed. However, DOE commits to exploring an on-site treatment system for sanitary sewage for any future permanent facilities constructed in support of legacy management such as the Multiple Use Facility currently under discussion.

Mr. James A. Saric
Mr. Tom Schneider

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The DOE believes this to be a reasonable compromise that will address the needs and concerns of both parties. The CAWWT is a temporary facility that will be removed once its purpose in groundwater remediation is completed. Contaminated soils surrounding the facility will also be removed and disposed as radioactive waste. The DOE agrees to install the tank in accordance with the design and operational criteria outlined in the draft rule of April 2004.

Based on concerns from OEPA relative to the expense of transporting and disposing collected sewage, Fluor Fernald has obtained an estimate for the hauling of sanitary sewage of \$225 per load which we believe to be reasonable considering the temporary nature of the facility and the need to further remediate soils around the facility. In addition DOE believes OEPA's policy is not being compromised as this installation should not establish any precedent that can be used by other members of the regulated community given this installation is in direct support of a groundwater remediation operation under the direction of the federal government engaged in remediation on federal land under CERCLA.


The DOE wishes to secure your agreement with this path forward before finalizing the design for this installation. Once the design has been finalized it will be submitted to your office for your review.

In addition to the holding tank to support CAWWT operations, the DOE will be needing to use a combination of temporary restroom trailers (with holding tanks) and chemical toilets to support site-wide sanitary wastewater needs from the time the existing sewage treatment plant is removed from service (approximately June 2005) through site closure (approximately March 2006). The removal of the sewage treatment plant is necessary to accomplish the required decommissioning and dismantlement of structures and soil remediation.

The DOE is committed to ensuring the holding tank to support CAWWT operations and all other temporary restroom facilities are operated such that no nuisance conditions develop and that the sewage is always managed and disposed by a reputable waste hauler.

If you have any questions, please contact Johnny Reising at 513-648-3139.

Sincerely,


William J. Taylor
Director

Mr. James A. Saric
Mr. Tom Schneider

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cc:

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